

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1

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Special Counsel for Chapter 7 Trustee, John W.

Hargrave

In re:

LOCALBIZUSA, INC.,

Debtor.

**LOCALBIZUSA, INC., by and through JOHN W.
HARGRAVE, Chapter 7 Trustee,**

Plaintiff,

v.

**UNIQUE BILLING SOLUTIONS, LLC, a Nevada
Limited Liability Corporation, JEFFREY
ROSENBERG, an individual, FRANK CAHILL, an
individual, and, JOHN DOES 1-10, individuals,**

Defendants.

Chapter 7

Case No. 09-20654 (JNP)

**Adversary No. 14-1454 (JNP)
Hon. Jerrold N. Poslusny, Jr.**

**CERTIFICATION OF EDMOND M.
GEORGE, ESQUIRE
IN SUPPORT OF ENTRY OF
JUDGMENT BY DEFAULT**

I, Edmond M. George, being duly sworn, deposes and says:

1. I am a partner with Obermayer Rebmann Maxwell & Hippel LLP, special counsel to John W. Hargrave, as Chapter 7 Trustee for LocalBizUSA, Inc. (the "Plaintiff"), the above-captioned plaintiff herein. I am fully familiar with the facts and circumstances recited herein. I submit this certification in support of Plaintiff's request for entry of default against Unique Billing Solutions, LLC, the defendant (the "Defendant") pursuant to Federal Rules of

Bankruptcy Procedure 7055-1(a), incorporating by reference Federal Rules of Civil Procedure 55(a).

2. On June 14, 2019, Plaintiff served the Third Amended Adversary Complaint on the Defendant.

3. On June 17, 2019, the Plaintiff filed the Certificate of Service in regard to the service of the Third Amended Complaint upon Defendant. [Adv. Docket No. 252].

4. The Defendant received service of the Third Amended Complaint via First Class U.S. Mail.

5. The time within which the Defendant may answer or otherwise file a response to the Third Amended Complaint with the Court has expired under the federal rules. The Defendant has not filed an answer or a response to the Third Amended Complaint with the Court.

6. As of the date hereof, I have received no answer or other responsive pleading from Defendant with respect to the Third Amended Complaint. In addition, I have examined the docket in the above-captioned adversary proceeding, and no response is reflected thereon.

7. As of the date hereof, the Defendant has not requested or has not been granted an extension of time to plead or otherwise defend.

8. Defendant is a limited liability company and is not an infant or incompetent person and is not subject to the military service of the United States.

9. Plaintiff respectfully requests entry of default against Defendant, Unique Billing Solutions, LLC.

Dated: July 12, 2019

By: s/ Edmond M. George
Edmond M. George, Esquire